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*Attorneys for Defendants,  
Infowars, LLC and Free Speech Systems, LLC*

**IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MATT FURIE,  
Plaintiff,  
vs.  
INFOWARS, LLC; FREE SPEECH  
SYSTEMS, LLC,  
Defendants.

Case No. 2:18-cv-01830-MWF-JPR

**DEFENDANTS INFOWARS, LLC  
AND FREE SPEECH SYSTEMS,  
LLC'S NOTICE OF MOTION TO  
MODIFY SCHEDULING ORDER**

Date: February 11, 2019  
Time: 10:00 a.m.  
Hon. Michael W. Fitzgerald

Case Filed: March 5, 2018  
Trial Date: July 16, 2019

1                   **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD,**  
2 **PLEASE TAKE NOTICE THAT** on February 11, 2019 at 10:00 a.m., before  
3 Courtroom 5A of the above-identified Court, located at First Street Courthouse, 350  
4 West First Street, Los Angeles, California 90012, Defendants Infowars, LLC and Free  
5 Speech Systems, LLC (collectively, “Defendants”) will, and hereby do, move for an  
6 order modifying the case’s Scheduling Order, specifically by extending the discovery  
7 period in this matter by 6 months or, in the alternative, by 1 month. The grounds for  
8 the instant Motion are more particularly set forth in the Memorandum of Points and  
9 Authorities filed concurrently. Briefly and without limitation to the foregoing,  
10 Defendants move for a modification of the Scheduling Order because (1) there are  
11 outstanding discovery disputes that will likely require additional time beyond the  
12 existing discovery and dispositive motions deadlines to resolve; (2) Defendants plan to  
13 depose the creator of the “El Sapo Pepe” character, who resides in Argentina, and likely  
14 must comply with the time-consuming procedures of the Hague Evidence Convention;  
15 and (3) the current scheduling order was put in place before Defendants’ current  
16 counsel appeared, and before Defendants asserted defenses to which testimony from  
17 the creator of “El Sapo Pepe” would be relevant.

18                  This Motion is based on this Notice of Motion, as well as on the Memorandum  
19 of Points and Authorities and exhibits thereto, the Declaration of Marc J. Randazza in  
20 support, the papers and pleadings on file in this action, and such arguments and  
21 evidence as may be introduced at the hearing on this Motion.

This motion is made following the conference of counsel pursuant to L.R. 7-3, via email correspondence, which took place on January 9, 2019. Counsel for Plaintiff informed counsel for Defendants that Plaintiff would not consent to a 6-month extension of the discovery period, but would consent to a 1-week extension for the purpose of deposing Plaintiff.

Dated: January 14, 2019

Respectfully submitted,

## RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

Marc J. Randazza

Alex J. Shepard

2764 Lake Sahara Drive, Suite 109

Las Vegas, NV 89117

*Attorneys for Defendants,  
Infowars, LLC and  
Free Speech Systems, LLC*

1 Case No. 2:18-cv-01830-MWF-JPR  
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3 **CERTIFICATE OF SERVICE**  
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5 I HEREBY CERTIFY that on January 14, 2019, I electronically filed the  
6 foregoing document with the Clerk of the Court using CM/ECF. I further certify that  
7 a true and correct copy of the foregoing document is being served via transmission of  
8 Notice of Electronic Filing generated by CM/ECF.  
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10 Respectfully submitted,  
11

12 s/Alex J. Shepard  
13 Employee,  
14 Randazza Legal Group, PLLC  
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16 **RANDAZZA | LEGAL GROUP**  
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